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L A W Y E R S

E-Filed on 6/1/07

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Attorneys for USACM Liquidating Trust

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA

In re:

USA COMMERCIAL MORTGAGE
COMPANY,

USA CAPITAL REALTY ADVISORS,
LLC,

USA CAPITAL DIVERSIFIED TRUST
DEED FUND, LLC,

USA CAPITAL FIRST TRUST DEED
FUND, LLC,

USA SECURITIES, LLC,
Debtors.

Affects:

- ☐ All Debtors
- ☒ USA Commercial Mortgage Company
- ☐ USA Capital Realty Advisors, LLC
- ☐ USA Capital Diversified Trust Deed Fund, LLC
- ☐ USA Capital First Trust Deed Fund, LLC
- ☐ USA Securities, LLC

Case No. BK-S-06-10725-LBR
Case No. BK-S-06-10726-LBR
Case No. BK-S-06-10727-LBR
Case No. BK-S-06-10728-LBR
Case No. BK-S-06-10729-LBR

CHAPTER 11

Jointly Administered Under Case No.
BK-S-06-10725 LBR

STIPULATION RE MANTAS GROUP'S OPPOSITION TO OBJECTIONS TO PROOFS OF CLAIM

On March 20, 2007, the USACM Liquidating Trust filed 33 omnibus objections to secured proofs of claim. The objections requested that the Court reclassify the claims as general unsecured claim (albeit subject to possible additional objections). Included in these objections were the following claims filed collectively by "The Mantas Group".

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Name of Claimant	Proof of Claim No.	Amount	Date Claim Filed	Omnibus Objection	Docket Entry
Nancy N. LaFleur Transfer on Death to Stephen & James R. LaFleur	10725-02302	\$115,000.00	1/13/2007	17	3165
DG Menchetti Ltd. Pension Plan, c/o DG Menchetti, Trustee	10725-02307	\$140,000.00	1/13/2007	7	3145
Menchetti, DG	10725-02306	\$900,000.00	1/13/2007	21	3174
Mantas, Leo	10725-02308	\$164,558.00	1/13/2007	19	3170
World Links Group, LLC c/o Leo G. Mantas	10725-02309	\$198,000.00	1/13/2007	33	3192
Anderson Family Trust DTD 8/21/92, Gary B. & Barbara L. Anderson, Trustees	10725-02301	\$500,000.00	1/13/2007	2	3135
Erven J. & Frankie J. Nelson Trust	10725-02305	\$450,000.00	1/13/2007	9	3149
Erven J. Nelson Ltd PSP dated 10/31/72	10725-02304	\$250,000.00	1/13/2007	9	3149
Zawacki, A California LLC	10725-02299	\$1,500,000.00	1/13/2007	33	3192
L. Earle Romak IRA	10725-02326	\$1,000,000.00	1/13/2007	10	3151

The Mantas Group filed an Opposition to Objection to Proofs of Claim [DE 3507] that acknowledged that the loans are secured by property owned by the various borrowers, and not the USACM Liquidating Trust.

Therefore, the Mantas Group, by and through their attorney, Erven T. Nelson of the law firm Bolick & Boyer, and the USACM Liquidating Trust, by and through their undersigned counsel, hereby stipulate and agree that the claims identified above be reclassified as general unsecured claims subject to further objection.

LEWIS
AND
ROCA
LLP
LAWYERS

1 Dated: June 1, 2007.

2 **LEWIS AND ROCA LLP**

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10 *Counsel for USACM Liquidating Trust*

11 -and-

12 Dated: May 25, 2007

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